

ZMO LAW PLLC

September 22, 2021

Via ECF

Hon. Ann M Donnelly
Eastern District of New York
US Courthouse, EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Felipe Rodriguez v. City of New York et al.*, 21-cv-01649

Dear Judge Donnelly:

This office represents Plaintiff Felipe Rodriguez in the above-captioned matter. We write to request an extension of time to file Plaintiff's opposition papers to motions to dismiss filed by the City Defendants and MTA/LIRR Defendants, respectively. Both sets of Plaintiff's opposition papers are currently due September 28, 2021. We request a one-week extension of that deadline to October 5, with a corresponding extension for Defendants' reply briefs from October 12 to October 19. This is the first request for an extension of this deadline.

We have conferred with counsel for the City Defendants and MTA/LIRR Defendants, and both consent to this request.

Thank you for your attention to this case.

Very truly yours,

Benjamin Notterman

Benjamin Notterman

CC: all counsel